

ORIGINAL

CTJW10

U.S. DISTRICT COURT  
NORTHERN DIST. OF TX.  
FORT WORTH DIVISION

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

CLERK OF COURT

WCL

UNITED STATES OF AMERICA

v.

NO. 4:17-CR-176-A (03)

JESSIE ALAN HUCKEL, (03)

a.k.a. Rome Huckel

**DEFENDANT'S SECOND UNOPPOSED MOTION FOR  
CONTINUANCE OF SENTENCING DATE**

**TO THE HONORABLE JUDGE OF SAID COURT:**

COMES NOW JESSIE ALAN HUCKEL, and submits this unopposed second motion for continuance of sentencing date and would show the following:

I.

On June 12, 2018, Mr. Huckel submitted a motion to continue sentencing and requested a new date to either August 1st, 2nd, or 3rd, 2018 or after August 10, 2018. [doc. 237]. On June 13, 2018, the Court issued an order granting the motion to continue sentencing [doc. 238] and reset Mr. Huckel's sentencing date to June 20, 2018 at 10:00 a.m.

II.

As stated in Mr. Huckel's first motion to continue sentencing, his wife Meagan Huckel will be out of town and unavailable on June 22, 2018 and will not be returning to town until the first week of August 2018. Unfortunately, Mrs. Huckel will be leaving the state on June 19, 2018 and has pre-purchased plane tickets. (Exh.1). As a result, she will also not be available on June 20, 2018 for Mr. Huckel's sentencing. Mrs. Huckel is not sure when she will return but has informed counsel that it will be around the end of the last week of July 2018.

Not only is Mrs. Huckel needed as a character witness, but she may also be needed to provided testimony to rebut information in the PSR pertaining to Defendant's PSR objections.

III.

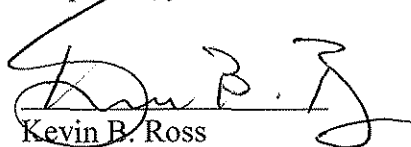
For the reasons stated above, undersigned counsel respectfully re-urges and requests the Court reset the sentencing date to either August 1st, 2nd, or 3rd, 2018 or after August 10, 2018. Counsel is tentatively scheduled to have Oral Argument before the Fifth Circuit Court of Appeals on two cases the week of August 6, 2018.

Counsel has conferred with AUSA Frank Gatto, and he is not opposed to this request.

IV.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that this second unopposed motion for continuance of sentencing be granted.

Respectfully submitted,

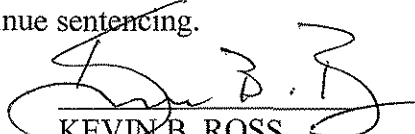
A handwritten signature in black ink, appearing to read "Kevin B. Ross", is written over a horizontal line.

Kevin B. Ross  
Texas State Bar No. 24033020  
LAW OFFICE OF KEVIN B. ROSS, P.C.  
8150 N. CENTRAL EXPY., SUITE M2070  
DALLAS, TEXAS 75206  
214-731-3151 (Office)  
214-594-8988 (Fax)

Attorney for Defendant


**CERTIFICATE OF CONFERENCE**

The undersigned certifies that on this 13th day of June, 2018, I conferred with Frank Gatto, attorney for the Government, and he stated that the Government has no opposition to the granting of his second unopposed motion to continue sentencing.

  
KEVIN B. ROSS

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and correct copy of the foregoing Defendant's Motion for Continuance of Sentencing Date was delivered via electronic means to Frank Gatto, Assistant United States Attorney, 801 Cherry Street, Suite 1700, Fort Worth, Texas 76102, to [frank.gatto@usdoj.gov](mailto:frank.gatto@usdoj.gov), on this the 13th day of June, 2018.

  
KEVIN B. ROSS

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## YOUR ITINERARY

### Departure

Dallas-fort Worth, TX (DFW) to Los Angeles, CA (LAX)		Nonstop
 American Airlines Flight 2811		
11:45am	Tue. Jun 19	Dallas-fort Worth, TX (DFW)
12:58pm	Tue. Jun 19	Los Angeles, CA (LAX)
		Economy
Total Trip Time: 3h 13m		<a href="#">Change Flights</a>
<a href="#">See Baggage Allowance Details</a>		

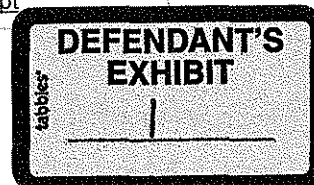
**\* Basic Economy fares come with some airline restrictions:**

Travelers are limited to 1 item that fits under the seat (no access to overhead bin). Seats are assigned at check-in (†). Flights are not eligible for upgrades (†). Travelers board in last group. No changes or refunds (†).

(†) Rules apply to all passengers including AAdvantage elites.

### RECEIPTS

Date	Receipt #	Details	Amount
May 15, 2018	#92640472	<a href="#">View Receipt</a>	\$276.40 USD



Total: \$276.40 USD

## TRAVELERS

Name	E-ticket
Megan Mckinney	American Airlines: 001-7113731860
Trista Huckel	American Airlines: 001-7113731859
Hadleigh Honea	American Airlines: 001-7113731860

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